



2600 Bull Street
Columbia, SC 29201-1708

November 4, 1999

MEMORANDUM

To: Administrators, Renal Dialysis Facilities

From: Jerry L. Paul, Director
Health Licensing Section

Subject: Clarification of Staffing Standards

Note: This replaces the clarification notice dated September 20, 1999, sent to administrators of renal dialysis facilities.

The Department has reconsidered the request for exception to Regulation 61-97, Standards For Licensing Renal Dialysis Facilities, regarding staffing. The resubmittal request was made by the Renal Dialysis Advisory Council in a September 30, 1999, letter to Mason Brooks, Assistant Deputy Commissioner for Health Regulations, DHEC. This pertains to Section 305.B which requires that "Additional direct care personnel (RN's, LPN's, or patient care technicians) shall be on duty to assure a ratio of one person to each four stations or fraction thereof," and Section 404.C which requires that "At least one registered nurse shall be on duty during each patient shift for each 10 stations or portion thereof."

Specifically, the council was seeking a definition of "on duty" to mean "readily available" and also that the "staff was in the building and immediately available to the patient care area."

After careful re-evaluation and review, clarification of the term "on duty" shall mean "in the building and immediately available." However, as a reminder, Section 305 requires that "personnel shall be employed in sufficient numbers to carry out the functions of the facility;" therefore, the placement of additional staff on the treatment floor remains a possible corrective action should conditions on-site warrant.

If there are questions, please call Rob Lawyer or George Moore at (803) 737-7370.

JLP/JML

cc: Mason Brooks
Rob Lawyer
George Moore

11/9/99
SB



2600 Bull Street
Columbia, SC 29201-1708

September 20, 1999

MEMORANDUM

To: Administrators, Renal Dialysis Facilities

From: Jerry L. Paul, Director
Health Licensing Section

Subject: Clarification of Staffing Standards

At a recent Renal Dialysis Advisory Council meeting, the council recommended to this Department that requests for exception be made to those sections in Regulation 61-97, Standards For Licensing Renal Dialysis Facilities, regarding staffing. The requests for exception were evaluated but denied for the following specific reasons:

- 1) R61-97 contains only minimum staffing standards;
- 2) Inspectors continue to cite violations regarding staffing ratios on the treatment floor;
- 3) These are chronically ill, extremely vulnerable patients receiving high-risk treatment.

In the process of evaluating these requests, it was determined that further clarification of these sections of R61-97 was indicated; these clarifications are as follows:

Section 305.B of, requires that "Additional direct care personnel (RN's, LPN's, or patient care technicians) shall be on duty to assure a ratio of one person to each four stations or fraction thereof." This ratio must be maintained on the treatment floor of the facility at all times, to include break and lunch periods.

In addition, Section 404.C requires that "At least one registered nurse shall be on duty during each patient shift for each 10 stations or portion thereof." This ratio must be maintained for the period beginning after initiation of treatment and ending when the last patient has exited the facility. The RN's required by the standard may be temporarily off the treatment floor provided s/he is in the building and immediately available.

If there are questions, please call Rob Lawyer or George Moore at (803) 737-7370.

JLP/JML/gm